



'Christ at the centre, children at the heart'

Our Lady of Walsingham Catholic Multi-Academy Trust will deliver outstanding educational, spiritual and moral outcomes for all children regardless of their faith or backgrounds within an ethos based on full inclusion, high expectations, innovation, outstanding teaching and learning, and a relentless focus on the needs and potential of every child. Our vision is that every Academy within the Trust has a reputation for excellence in their local communities and beyond.

Our Lady of Walsingham Catholic MAT

Company No: 08444133

Registered Office: Fordham Road, Newmarket, Suffolk, CB8 7AA

Bring Your Own Device Policy

Policy Statement

The MAT recognises that many employees will have their own personal mobile devices (such as smartphones and tablets) which they could use for Academy purposes and also that there can be benefits for both the Academy and staff in permitting such use. However, the use of personal mobile devices for academy purposes can give rise to an increased risk in terms of the security of the Academy's IT networks and communications systems, the protection of confidential or otherwise sensitive information and compliance with legal obligations, such as data protection requirements.

With the prior permission of their manager, employees may use a personal mobile device for academy purposes, provided always that they adhere to the terms of this policy. However, employees are not required to use their personal mobile device for academy purposes if they do not wish to do so.

Before using a device under this policy for the first time, employees must erase all information and software related to any previous employment.

Scope and Purpose of the Policy

This policy applies to all employees who use a personal mobile device for academy purposes. It applies to use of the device both during and outside your normal working hours and whether or not your use of the device takes place at your Academy. This policy applies to all devices which are used to access the Academy's IT resources and communications systems, which may include smartphones, mobile phones, tablets, laptops etc.

When you access the Academy's systems, you may be able to access data about the Academy and our pupils, parents, contractors or suppliers, including information which is confidential or otherwise sensitive. When you access the Academy's systems using a device, the Academy is also exposed to a number of risks, including from the loss or theft of the device (which could result in unauthorised access to the Academy's systems or data), the threat of malware (such as viruses, spyware or other threats that could be introduced via a device) and the loss, wrongful disclosure or unauthorised alteration or deletion of Academy data (which could expose the Academy to the risk of non-compliance with legal obligations relating to confidentiality, data protection and privacy).

The purpose of this policy is to protect the Academy's systems and data and to prevent Academy data from being deliberately or accidentally lost, disclosed, deleted or altered, while enabling employees to access the Academy's systems using a device.

Connecting Devices to the Academy's Systems

Connectivity of all devices is managed by the IT department, who must approve each device as providing an appropriate level of security before it can be connected to the Academy's systems or network. The IT department has the absolute discretion to approve or reject a device and the Academy reserves the right to refuse or revoke permission for a particular device to connect with its systems, for example where a device is being or may be used in a way that puts, or could put, the Academy and its employees, pupils, parents, systems or data at risk or that may otherwise breach this policy. In order to access the Academy's systems, it may be necessary for the IT department to install software applications on the device. If any such software is removed, access to the Academy's systems will be disabled.

The Academy has the absolute right to determine what types of data can be processed on a device and what may not and you will be advised of any types of data that is restricted or prohibited.

The Academy's acceptable usage and data protection policy will also continue to apply as appropriate to the device, for example where Internet sites or work e-mails are accessed on the device via the Academy's network.

Where a device which is connected to the Academy's systems develops a technical problem, fault or failure, the IT department will provide initial technical support to assist in determining if the issue with the device is software or hardware related. If the issue is hardware related or relates to software which you have installed, then you will be responsible for resolving it, including any repairs, maintenance or replacements costs and services. If it relates to software the Academy has provided, then it will provide any necessary support.

Device Monitoring

The content of the Academy's systems and data is the property of the Academy. All data, information and communications, including but not limited to e-mail, telephone conversations and voicemail recordings, instant messages and Internet and social media postings and activities, created on, transmitted to, received from, or stored or recorded on a device during the course of the Academy's business or on the Academy's behalf is the Academy's property, regardless of who owns the device.

The Academy reserves the right (remotely or otherwise) to inspect, monitor, intercept, review, disclose, remove or destroy all content on the device that has been created for or on behalf of the Academy and to access applications used on it for this purpose. This includes the monitoring, interception, accessing, recording, disclosing, inspecting, reviewing, retrieving, printing, removal, destruction or deletion of transactions, messages, communications, posts, log-ins, recordings and other uses of the device. It is possible that personal data may be inadvertently monitored, intercepted, reviewed or erased. Therefore, employees should have no expectation of privacy in any personal data on the device. Employees are advised not to use the

Academy's systems for communications of a sensitive or confidential nature because it is not guaranteed to be private.

The purposes for such monitoring are:

- to promote productivity and efficiency
- to ensure the security of the Academy's systems and their effective operation
- to prevent misuse of the device and protect Academy data
- to ensure there is no unauthorised use of the Academy's time or systems
- to ensure that all employees are treated with respect and dignity at work, by discovering and eliminating any material that is capable of amounting to unlawful harassment
- to ensure that employees do not use the Academy's facilities or systems for any unlawful purpose or activities that may damage the Academy's reputation
- to ensure there is no breach of confidentiality or data protection.

The Academy may also store copies of any content for a period of time after it is created and may delete such copies from time to time without notice.

By agreeing to use your personal mobile device for Academy purposes, you confirm your agreement to such inspection or monitoring and to the Academy's right to copy, erase or remotely wipe the entire device, including any personal data stored on the device. Although the Academy does not intend to wipe personal data, it may not be possible to distinguish all such information from Academy data. You should therefore regularly backup any personal data contained on the device.

You also agree that you use the device at your own risk and that the Academy will not be responsible for any loss, damage or liability arising out of its use, including any loss, corruption or misuse of any content or loss of access to or misuse of the device, its software or its functionality.

You must co-operate with the Academy to enable such inspection or monitoring, including providing any passwords or pin numbers necessary to access the device or relevant applications.

The Academy shall use reasonable endeavours not to access, copy or use any personal data held on the device, unless absolutely necessary. If such copying occurs inadvertently, the Academy will delete such personal data as soon as it comes to its attention.

Security Requirements

You must:

- at all times, use your best efforts to physically secure the device against loss, theft or use by persons who have not been authorised to use the

device. You must secure the device whether or not it is in use and whether or not it is your current possession. This includes passwords, encryption technologies and physical control of the device

- install any anti-virus or anti-malware software at the Academy's request before connecting to its systems and consent to the Academy's procedures to manage the device and secure its data, including providing the Academy with any necessary passwords
- protect the device with a pin number or strong password, and keep that pin number or password secure at all times. If the confidentiality of a pin number or password is compromised, you must change it immediately
- ensure that access to the device is denied if an incorrect pin number or password is input too many times and ensure that the device automatically locks if inactive for a period of time
- maintain the device's original operating and security system and settings, and keep it current with security patches and updates
- prohibit use of the device by anyone not authorised by the Academy, including family and friends
- not download and install untrusted or unverified software or applications unless explicitly authorised by the Academy - if in doubt, contact IT support
- not download or transfer any restricted or prohibited types of Academy data to the device, for example via e-mail attachments, or store any such restricted or prohibited types of Academy data on the device unless you have been specifically authorised to do so, and you must immediately erase any such information that is inadvertently downloaded to the device
- not backup the device locally or to cloud-based storage applications where that might result in the backup or storage of Academy data and any such backups inadvertently created must be deleted immediately
- where you are permitted to store Academy data on the device, ensure that it is encrypted using appropriate encryption technologies approved by the IT department.

If the Academy discovers or reasonably suspects that there has been a breach of this policy, including any of the security requirements listed above, it shall immediately remove access to its systems and, where appropriate, remove any Academy data from the device.

In the event of a lost or stolen device, or where you believe that a device may have been accessed by an unauthorised person or otherwise compromised, you must report the incident immediately to the IT Director. Appropriate steps will be taken to ensure that Academy data on or accessible from the device is secured, including remote wiping of the device where appropriate. The remote wipe will destroy all Academy data on the device (including information contained in a work e-mail account, even if such e-mails are personal in nature). Although the Academy does not intend to wipe personal data, it may not be possible to distinguish all such information from Academy data.

On termination of employment, on or before your last day of employment by the Academy, all Academy data (including work e-mails), and any software applications

provided by the Academy, will be removed from the device. If this cannot be achieved remotely, the device must be submitted to IT support for wiping and software removal. You must provide all necessary co-operation and assistance to IT support in relation to this process. The same process will apply if you intend to sell the device or to return it to the manufacturer or take it to a third party for repair or replacement.

Costs

You must pay for your own device costs under this policy, including but not limited to voice and data usage charges and any purchase, repair or replacement costs. You acknowledge that you are responsible for all costs associated with the device and that your Academy usage of the device may increase your voice and data usage charges.

Disciplinary Action

Failure to comply with any of the requirements of this policy is a disciplinary offence and may result in disciplinary action being taken under the MAT's disciplinary procedure. Breach of this policy may also lead to the Academy revoking your access to its systems, whether through a device or otherwise.

Employees are required to co-operate with any investigation into suspected breach, which may involve providing the Academy with access to the device and any relevant passwords and login details.